

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ASSOCIATED RECOVERY, LLC,

Plaintiff,

v.

JOHN DOES 1-44,

Defendants *in rem*.

No. 3:16-CV-1025-N-BN

In re:

744.COM	KXW.COM	UHW.COM	YJX.COM
028.COM	LNМ.COM	VCZ.COM	YLZ.COM
3DCAMERA.COM	LUOHE.COM	VGJ.COM	YQP.COM
FNУ.COM	MEQ.COM	WYD.COM	YQT.COM
FX2.COM	OCU.COM	XAQ.COM	YRN.COM
FXF.COM	PIXIE.COM	XFF.COM	YTE.COM
JTZ.COM	QMH.COM	XSG.COM	YYG.COM
KGJ.COM	RUTEN.COM	YCX.COM	ZDP.COM
KMQ.COM	SDU.COM	YEY.COM	ZHD.COM
KOU.COM	SQG.COM	YGX.COM	ZULIN.COM
KXQ.COM	TAOLV.COM	YJR.COM	ZZM.COM

NOTICE OF RELATED CASES

Please take notice that—to the best of the Defendants’ knowledge, information, and belief, formed after an inquiry reasonable under the circumstances—the case currently before the Court arises from a common nucleus of operative facts with the following cases:

Netsphere, Inc. v. Baron, No. 3:09-CV-0988-L (N.D. Tex.) (Lindsay, J.)
(administratively closed on Mar. 27, 2015). In a March 27, 2015 Order, **Judge Lindsay** wrote:

The court shall retain **exclusive jurisdiction** of this case over any disputes that may arise concerning this or any earlier order, the wind down of the Receivership

estate, and the relief provided under this order, or any controversy that arises from or relates to the Receivership or actions of the Receiver or his professionals.

No. 3:09-CV-0988-L, Dkt. 1447, at 21.¹ The Internet domain names at issue in the case at bar were sold through a receivership established in the *Netsphere* litigation. See Complaint at ¶¶ 240-247 (No. 3:16-CV-1025-N-BN, Dkt. 1).

Baron v. Vogel, No. 3:15-cv-232-L (N.D. Tex.) (Lindsay, J.) (dismissed with prejudice on Mar. 31, 2016). On March 31, 2016, **Judge Lindsay** granted a Rule 12(b)(6) motion to dismiss that case. No. 3:15-cv-232-L, Dkt. 49. The defendants removed the *Baron* case from Texas state court to Judge Lindsay at least in part because of the above-quoted Order in *Netsphere*, by which Judge Lindsay retained exclusive jurisdiction over matters stemming from that case. *Id.* at 5. In his March 31st Memorandum Opinion and Order, Judge Lindsay reaffirmed exclusive jurisdiction. *Id.*

¹ As of this filing, there are 1,459 docket entries in *Netsphere, Inc. v. Baron*, a case that then-presiding Judge Furgeson called a “nightmare.” No. 3:09-CV-0988-L, Dkt. 1447, at 3 (N.D. Tex. May 29, 2013).

Dated: April 20, 2016

Respectfully submitted

By: /s/ Steven M. Geiszler

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ycx.com, ygx.com, yjr.com, yqp.com, yqt.com,
yrn.com, yyg.com, zdp.com, zhd.com,
zulin.com, zzm.com and Defendants Jinwu
Chen, Xumin Huang, Feng Lu, Yuhua Jiang,
Zhilong Chu, Yaoguang Zhu, Yanbin Lin, Yu
Lin, Xiaofeng Lin, Fengjing Zheng, Xiaoying
Li, Liwei Liu, Dongdong Xu, Teng Wang,
Yang Gao, Xiaohang Shen, Feng Yan*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 20, 2016 I caused the foregoing document to be served on counsel of record via the Court's CM/ECF system.

/s/ Steven M. Geiszler

Steven M. Geiszler